

Exhibit C



Deposition of:
Darren Hurst , M.D., Vol. II
August 7, 2017

In the Matter of:
**In Re: Bard IVC Filters Products
Liability**

Veritext Legal Solutions
1075 Peachtree St. NE , Suite 3625
Atlanta, GA, 30309
800.808.4958 | calendar-atl@veritext.com | 770.343.9696

In Re: Bard IVC Filters Products Liability

Page 231

1 Q. On the issue of caudal migration,
2 you were asked questions about whether caudal
3 migration itself is symptomatic or
4 asymptomatic. Do you recall those questions?

5 A. Yes.

6 Q. Is caudal migration problematic in
7 a filter?

8 MR. NORTH: Objection to the form.

9 A. With the Bard filters, caudal
10 migration in the --

11 BY MR. O'CONNOR:

12 Q. Well, let me rephrase that.

13 A. Yeah.

14 Q. What do you mean by caudal
15 migration when you talk about filters?

16 A. When I talk about the Bard filters
17 and caudal migration, what I mean is basically
18 a settling that occurs with the filters, a
19 splaying out of the legs.

20 The Bard filters tended to behave
21 differently in that when they were in the
22 inferior vena cava, the legs had a tendency to
23 penetrate through the wall, and because they
24 were of a smaller diameter of Nitinol and the
25 filter is not quite as stiff or rigid as the